

00274 D

COURTNEY M. PRICE
VICE PRESIDENT
CHEMSTAR

**American
Chemistry
Council** Good Chemistry
Makes It Possible

2pp

VIA HAND DELIVERY

E.-015

June 25, 2001

The Honorable Christine T. Whitman,
Administrator
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

RECEIVED
OPPTS
2001 JUN 27 PM 3:

RE: OPPTS-00274D; Voluntary Children's Chemical Evaluation Program (VCCEP)

Dear Administrator Whitman:

The American Chemistry Council n-Alkanes VCCEP Consortium is responding to the notice published in the December 26, 2000, *Federal Register* (FR) announcing the pilot of the Voluntary Children's Chemical Evaluation Program (VCCEP). The companies participating in the **n-Alkane** VCCEP Consortium are Chevron Phillips Chemical Company LP, CONDEA Vista Company, and Shell Chemical Company. The Consortium will sponsor the following chemicals:

Sponsored CAS Numbers for VCCEP Pilot – Tier 1

Chemical	CASRN	Start Date
Decane	124-18-5	12-24-01
Undecane	1120-21-4	12-24-01
Dodecane	112-40-3	12-24-01

We understand that sponsoring these chemicals in Tier 1 of the VCCEP pilot means that the Consortium and its member companies have made a voluntary commitment to develop hazard and exposure data, consistent with the requirements of Tier 1 of the pilot program. As recognized in EPA's announcement of the VCCEP pilot, commitments are not enforceable agreements or contracts. If for any reason this voluntary initiative will not be undertaken by the Consortium then any expressed or implied commitment to Tier 1 of the VCCEP will devolve to the manufacturers and importers of the relevant chemicals.

The Consortium shares the concerns raised by other participants regarding timing, exposure **from** sources outside the chain of commerce, and selection of a peer consultation contractor. We hope to resolve these with the Agency as we move forward with this voluntary initiative.



Responsible Care®

Contain NO CBI

We will make every effort to make the Tier 1 submissions for these chemicals in a timely fashion. The Agency should note that these chemicals have all been sponsored under the OECD SIDS Program by different countries and that assessments are still being developed. In order to avoid a large duplication of effort, the Consortium intends to utilize the information being developed under the OECD SIDS Program. As such, the timing for submission of the VCCEP tier 1 data will be affected by these ongoing activities. Therefore, the Consortium is unable to provide a submission date as requested in the FR notice. We are available to meet with Agency staff to develop a schedule for completion.

The technical contact for this activity is Andrew Jaques, **n-Alkane** VCCEP Consortium Manager. He can be reached at 703-741-5627 (phone), 703-741-6091 (fax) or Andrew-Jaques@americanchemistry.com. Please contact Mr. Jaques if you have any questions regarding this commitment.

Sincerely yours,

Courtney M. Price,
Vice-President, CHEMSTAR

cc: U.S. EPA, Document Control Office (7407)
Office of Pollution Prevention and Toxics

Stephen Johnson, Assistant Administrator
Office of Prevention, Pesticides and Toxic Substances

Charles Auer, Director
Chemical Control Division
Office of Pollution Prevention and Toxics

n-Alkane VCCEP Consortium Members